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15 *Attorneys for Defendants Panasonic Corporation, Panasonic Corporation of North America, and*
16 *MT Picture Display Co., Ltd.*

17 **UNITED STATES DISTRICT COURT**
NORTHERN DISTRICT OF CALIFORNIA
18 **SAN FRANCISCO DIVISION**

19 In re CATHODE RAY TUBE (CRT)
20 ANTITRUST LITIGATION

Master Case No. 3:07-cv-05944-SC

MDL No. 1917

21 This Document Relates to:

Individual Case No. 3:14-cv-02510

22 *ViewSonic Corporation v. Chunghwa*
23 *Picture Tubes, Ltd., et al.*, No. 3:14-cv-
24 02510

DECLARATION OF ADAM C.
HEMLOCK IN SUPPORT OF THE
PANASONIC DEFENDANTS'
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PURSUANT TO CIVIL
LOCAL RULE 79-5(d) AND 7-11

1 I, Adam C. Hemlock, hereby declare as follows:

2 1. I am an attorney with Weil, Gotshal & Manges LLP, counsel for Defendants Panasonic
3 Corporation, Panasonic Corporation of North America, and MT Picture Display Co., Ltd.
4 (collectively, the “Panasonic Defendants”) in these actions. I am a member of the bar of the State of
5 New York, and I am admitted to practice before this Court pro hac vice.

6 2. I submit this Declaration in support of the Panasonic Defendants’ Administrative Motion to
7 File Documents Under Seal Pursuant to Civil Local Rules 79-5(d) and 7-11. I have personal
8 knowledge of the facts stated herein and, if called as a witness, I could and would competently
9 testify thereto.

10 3. On June 18, 2008, the Court approved a “Stipulated Protective Order” in this matter (Dkt.
11 No. 306) (the “Protective Order”).

12 4. Pursuant to the Protective Order and Local Civil Rules 7-11 and 79-5(d), the Panasonic
13 Defendants seek to seal the following concurrently-filed document: the highlighted portions of the
14 Reply in Support of Panasonic Defendants’ Motion to Dismiss and to Compel Arbitration against
15 Plaintiff ViewSonic Corporation (“ViewSonic”).

16 5. The highlighted portions of the Reply in Support of Panasonic Defendants’ Motion to
17 Dismiss and to Compel Arbitration reference confidential information contained in the OEM supply
18 agreement previously sealed pursuant to the Order Granting the Panasonic Defendants’
19 Administrative Motion to File Under Seal, dated September 5, 2014 (Dkt. 2800). Specifically,
20 portions of pages 1, 2, 3, 4, 5 and 6 of the Reply in Support of Panasonic Defendants’ Motion to
21 Dismiss and to Compel Arbitration contain such confidential information.

22 6. The Panasonic Defendants seek to submit the material referenced herein under seal in good
23 faith in order to comply with the Protective Order in this action and the applicable Local Rules.
24 Because the information in the materials that the Panasonic Defendants seek to submit under seal
25 have been designated as “Highly Confidential” by ViewSonic (the “Designating Party”), the
26 Panasonic Defendants are filing the accompanying Motion to File Under Seal, and will be prepared
27 to file unredacted versions of the Reply in Support of Panasonic Defendants’ Motion to Dismiss and
28

1 to Compel Arbitration in the public record “[i]f the Designating Party does not file a responsive
2 declaration as required by subsection 79-5(e)(1) and the Administrative Motion to File Under Seal is
3 denied.” Civ. L.R. 79-5(e)(2).

4
5 I declare under penalty of perjury that the foregoing is true and correct.

6 Executed on October 6, 2014 at New York, New York.

7 By: /s/ Adam C. Hemlock
8 ADAM C. HEMLOCK
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